**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

Case No. 1:18-cv-11826-NMG

STEVEN SANDOE, individually and on
behalf of all others similarly situated,

   Plaintiff,

v.

BOSTON SCIENTIFIC CORPORATION,
a Massachusetts corporation,

   Defendant.

DECLARATION OF AVI R. KAUFMAN

   I, Avi R. Kaufman, declare under penalty of perjury that the following statements are true:

   1. I am counsel for Plaintiff Steven Sandoe.

   2. I have extensive experience in the prosecution of class actions on behalf of consumers, particularly claims under the Telephone Consumer Protection Act, 47 U.S.C. §227 ("TCPA"), as does co-counsel Stefan Coleman. As a result of our extensive experience litigating TCPA class claims, we are well-aware of the significant time and resources needed to litigate such actions, and our firms possess the resources necessary to prosecute these actions successfully.

   3. My firm keeps contemporaneous time records, and the rates for our attorneys are commensurate with my experience and are commensurate with market rates in Boston for attorneys with similar levels of experience.

   4. I have been licensed to practice law in the state of Florida since 2010. I founded Kaufman P.A. in January 2018. Prior to that, I practiced law at Kopelowitz Ostrow (from 2016 to 2018) and Carlton Fields (from 2010 to 2016).

   5. I am a 2007 graduate of Harvard University and a 2010 graduate of Georgetown University Law Center.

   6. My firm resume and Stefan Coleman's firm resume are attached hereto as Composite Exhibit A.

   7. Throughout the pendency of this case, my co counsel and I have maintained contact with Plaintiff Sandoe to discuss the prosecution of the case. The communications and

exchanges with Plaintiff occurred during the initial investigation and throughout the litigation, and continue today. Plaintiff Sandoe and I have regularly discussed this case, the issues involved in the case and the overall strategy together. Plaintiff Sandoe has been, and continues to be, focused on the advancement of the interests and claims of the Classes over his own interest and has always been concerned about obtaining a result that was best for the Classes.

8.   I submit this declaration in support of Plaintiff Steven Sandoe's motion for class certification. The facts herein stated are true of my own personal knowledge and if called to testify to such facts, I could and would do so competently.

9.   My law firm is fully prepared to commit all necessary resources, financial and otherwise, to oversee the adequate administration of this case, as well as to protect the best interests of the Classes.

Dated: June 21, 2019   */s/ Avi R. Kaufman*
                                         Avi R. Kaufman

COMPOSITE EXHIBIT A

kaufman

400 Northwest 26th Street ■ Miami, Florida 33127
kaufman@kaufmanpa.com ■ (305) 469-5881 ■ www.KaufmanPA.com

Law Firm Resume

Kaufman P.A. is a law firm specializing in consumer class actions and complex business litigation matters. Since 2010, the attorneys of Kaufman P.A. have worked on consumer class action cases that have ended in class-wide settlements totaling more than $100 million. Kaufman P.A.'s attorneys have also successfully recovered millions of dollars in settlements and judgments for plaintiffs in breach of contract actions in the media, real estate, fashion, healthcare, telecommunications, and banking industries.

Avi R. Kaufman, Esq. has a degree in government from Harvard University and a JD from Georgetown University Law Center. Prior to founding Kaufman P.A., Avi worked at Kopelowitz Ostrow Ferguson Weiselberg Gilbert and Carlton Fields Jorden Burt in their national class action and commercial litigation practice groups.

During the last two years, Avi has specialized in matters arising under the Telephone Consumer Protection Act and has been appointed as class counsel or interim lead counsel in the following actions:

- *Gottlieb v. CITGO Petroleum Corporation* (S.D. Fla. 2017), a nationwide Telephone Consumer Protection Act class action resulting in an $8.3 million class wide settlement.

- *In re Uber Text Messaging* (N.D. Cal. 2018), a national Telephone Consumer Protection Act putative class action which is ongoing.

- *Broward Psychology, P.A. v. SingleCare Services, LLC* (Fla. Cir. Ct. 2019), a Florida Telephone Consumer Protection Act class action resulting in a $925,110 class wide settlement.

- *Van Elzen v. Educator Group Plans, et. al.* (E.D. Wis. 2019), a nationwide Telephone Consumer Protection Act class action resulting in a $900,000 class wide settlement.

- *Halperin v. YouFit Health Clubs, LLC* (S.D. Fa. 2019), a nationwide Telephone Consumer Protection Act class action resulting in a $1.4 million class wide settlement.

THE LAW OFFICES OF
STEFAN COLEMAN, P.A.

PHONE (877) 333-9427 | FAX (888) 498-8946   NEW YORK | NEW JERSEY | FLORIDA
EMAIL: LAW@STEFANCOLEMAN.COM   CLASSACTION.WS

The Law Firm Resume

The Law Offices of Stefan Coleman is a dynamic law firm that concentrates its practice on consumer law and technology. The core of the law firm is based on an in-depth knowledge of an ever-evolving technology and its impact on the law. Specifically, the firm has devoted much of its practice to protecting consumers' privacy rights as well as protecting consumers from product defects and false advertisements. The firm also works on behalf of companies to alert them to the most recent changes and evolutions in the law as it applies to their industry as well as litigating class action cases. The firm has participated in a number of significant class actions on behalf of consumers.

Stefan Coleman, Esq. is a graduate of the University of Virginia and the University of Miami School of Law. He has practiced law for over ten years in which time he has participated in a number of significant class actions on behalf of consumers. The following is a brief list of some of the class actions in which he has participated.

Love v. IdeaVillage Products Corp et al, a consumer class action in which certain purchasers could recover a full refund for their purchase of an alleged defective product sold by the defendant. This case resulted in the defendant changing its business practice.

Xexo v. iRenew Bio Energy Solutions et al, a consumer class action in which purchasers of the iRenew bracelet recovered for the alleged false advertising by the defendant.

In re Jiffy Lube, a Telephone Consumer Protection Act case that resulted in a $35 million recovery for consumers for the unsolicited text message advertising. Several major issues of law were settled in this case resulting in a massive victory for consumers.

Pimental v. Google Inc., a Telephone Consumer Protection Act case that resulted in a $6 million settlement for consumers who received a text message from Google's Slide app.

Woodman v. ADP Dealer Services, Inc., et al., a Telephone Consumer Protection Act case that resulted in a $7.5 million settlement for consumers who received unsolicited text messages promoting car sales.

Lanza v. Palm Beach Holdings., et al., a Telephone Consumer Protection Act case that resulted in a $6.5 million settlement for consumers who received unsolicited text messages.

THE LAW OFFICES OF
STEFAN COLEMAN, P.A.

Kolinek v Walgreen, Co. a Telephone Consumer Protection Act case that resulted in an $11 million settlement for consumers who received unsolicited calls to their cell phone.

Hopwood v. Nuance Communications., et al., a Telephone Consumer Protection Act case that resulted in a $9.24 million settlement for consumers who received unsolicited calls.

Flanigan v. The Warranty Group, Inc. and American Protection Plans LLC d/b/a American Residential Warranty, a Telephone Consumer Protection Act case that resulted in a $16 million settlement for consumers who received unsolicited calls.

Martin v. Global Marketing Research Services, a Telephone Consumer Protection Act case that resulted in a $10 million fund for consumers who received unsolicited calls.

Stone & Co. v. LKQ Corporation, a Telephone Consumer Protection Act case that resulted in a $3.26 million fund for consumers who received faxes from the defendant.